

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v.-

DOMINICK P. CAROLLO, STEVEN E.
GOLDBERG, and PETER S. GRIMM,

Defendants.

S1 10-CR-654 (H.B.)

**NOTICE OF DEFENDANTS'
JOINT MOTION TO DISMISS
THE SUPERSEDING
INDICTMENT AS TIME-BARRED AND
TO COMPEL THE PRODUCTION
OF A DETAILED
BILL OF PARTICULARS**

ORAL ARGUMENT REQUESTED


PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of the Defendants' Joint Motion to Dismiss the Indictment as Time-Barred and Compel the Production of a Detailed Bill of Particulars under Federal Rules of Criminal Procedure 12(b) and 7(f), respectively, the defendants, Dominick P. Carollo, Steven E. Goldberg, and Peter S. Grimm, will move this Court, before the Honorable Harold Baer, Jr., United States District Judge for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York, on August 9, 2011, at 11:00 a.m., for the following relief:

1. For an Order, pursuant to Rule 12(b) of the Federal Rules of Criminal Procedure, dismissing with prejudice the Superseding Indictment as time-barred; and
2. For an Order, pursuant to Federal Rule of Criminal Procedure 7(f), directing the Government to provide a detailed Bill of Particulars; and
3. Granting such other and further relief as the Court may deem just and proper.

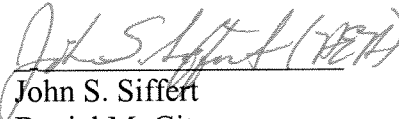
We respectfully reserve the right to make additional discovery motions based on our review, after the date of this filing, of any discovery the Government has already, or may in the future, produce.

Dated: July 1, 2011
New York, New York

Respectfully submitted:



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TO: Clerk of the Court
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007
(By ECF)

Honorable Harold Baer, Jr.
United States District Judge
Southern District of New York
(By Courtesy Copy Delivered to Chambers)

Antonia Hill, Esq.
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(By ECF and Regular Mail)

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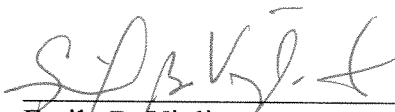
Defendants.

S1 10-CR-654 (H.B.)

CERTIFICATE OF SERVICE

I, Emily B. Viglietta, hereby certify that a true and correct copy of the Notice of Defendants' Joint Motion to Dismiss the Superseding Indictment as Time-Barred and to Compel the Production of a Detailed Bill of Particulars, and the Defendants' Joint Motion to Dismiss the Superseding Indictment as Time-Barred and to Compel the Production of a Detailed Bill of Particulars was served on all parties of record by the Court's ECF system, and by first class mail, postage prepaid on the following counsel, this 1st day of July, 2011:

Antonia Hill, Esq. U.S. DEPARTMENT OF JUSTICE, ANTITRUST DIVISION 26 Federal Plaza, Room 3630 New York, New York 10278	Steven Tugander, Esq. U.S. DEPARTMENT OF JUSTICE, ANTITRUST DIVISION 26 Federal Plaza, Room 3630 New York, New York 10278
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Emily B. Viglietta